

Privacy Notice

River and Mercantile Funds ICVC

Please read this privacy notice carefully as it contains important information on how and why the River and Mercantile Funds ICVC (the “Fund”) collects, stores, uses and shares personal information, as well as information on your rights in relation to your personal information and how to contact the Fund and supervisory authorities in the event you have a complaint.

Introduction

The Fund collects, uses and is responsible for certain personal information about you. When doing so the Fund is regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) from 25 May 2018 and the Fund is responsible as ‘controller’ of that personal information for the purposes of those laws.

As part of your investment in the Fund or interactions with the Fund (including the initial or subsequent application for shares, and including electronic communications or recorded phone calls where applicable), the Fund may, acting as a data controller, collect and process either through itself (or through third parties) your personal information or that of individuals connected with you (for example directors, officers, employees, representatives, shareholders, investors, clients, beneficial owners or agents).

The personal information the Fund collects and uses

Information collected by the Fund

The Fund (or any of its affiliates, agents, employees, delegates or sub-contractors) may collect the following personal information from you:

- first name and last name;
- personal identification documentation and related information including date of birth, place of birth, personal identification numbers, nationality and residential address;
- contact information including email and telephone numbers;
- personal bank account or brokerage account details; and
- where specifically requested, employment history, address history, proof of address.

Information collected from other sources

The Fund (or any of its affiliates, agents, employees, delegates or sub-contractors) may also obtain personal information from other sources such as private and/or public compliance databases. The information obtained will likely detail whether you may be a “politically exposed person” or whether you have committed particular crimes, relevant to your investment activity.

How the Fund uses your personal information

The Fund (or any of its affiliates, agents, employees, delegates or sub-contractors) may use your personal information to:

- manage and administer the opening of your account and holdings with the Fund and process any redemption, conversion, transfer and additional subscription requests as well as arrange payment of distributions (the “Services”) to the extent necessary for the performance of your contract with the Fund;
- carry out “know your client” and anti-money laundering checks, including checking such personal information against databases of individuals who are subject to sanctions, classified as “politically exposed persons” or have committed crimes as referenced above;
- report tax related information to tax authorities in order to comply with a legal obligation;
- monitor and record calls for quality control, business and statistical analysis, training and to improve service delivery;

- update and maintain records and fee calculations;
- otherwise where necessary for the legitimate interests of the Fund or a third party, where those and such legitimate interests are not overridden by your interests, fundamental rights or freedoms.

The Fund may also use your personal information to contact you about new or existing products or other information that may be relevant to you.

If you do not wish to receive marketing communications about the Fund's products and services, then you can select your choices by ticking the relevant boxes situated on the form on which the Fund (or any of its affiliates, agents, employees, delegates or sub-contractors) collects your contact information. You can change your marketing preferences at any time by emailing: marketing@riverandmercantile.com.

Reasons the Fund can collect and use your personal information

The lawful basis on which the Fund may collect and use your personal information includes:

- processing as is necessary for performance of a contract;
- processing for compliance with a legal obligation; and
- in respect of names, email and telephone numbers for marketing, the lawful condition for processing is legitimate interests.

Who the Fund shares your personal information with

The Fund may share your personal information with its service providers, including Bank of New York Mellon (International) Limited (the "**Administrator**"), and their affiliates, and other third party service providers engaged by the Fund in order to process the data for the purposes mentioned above in 'How the Fund uses your personal information'.

Some of those third party suppliers may be based outside the European Economic Area — for further information including on how the Fund and the Administrator safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

The Fund will share personal information with law enforcement or other authorities if required by applicable law.

How long your personal information will be kept

The Fund and the Administrator will hold your personal information for as long as the Fund and Administrator provide services to you and will hold personal information in archive after that date to the extent necessary for legitimate business purposes (currently 6 years).

Transfer of your information out of the EEA

The Fund and the Administrator may transfer your personal information to third party suppliers inside and outside the European Economic Area (EEA). Your personal information may also be disclosed to anti-fraud organisations and law enforcement or regulatory agencies anywhere in the world. Any such transfer of your personal information will be subject to appropriate safeguards to protect your personal information, including appropriate contractual protections.

The Fund has authorised the Administrator as its agent to put in place standard contractual clauses with relevant parties to whom personal data will be transferred.

The Fund will not otherwise transfer your personal data outside of the EEA.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how your personal information is used
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- requiring the correction of any mistakes in your information which the Fund holds
- requiring the erasure of personal information concerning you in certain situations (please note that this right is unlikely to apply to the personal data you provide to the Fund, given the purposes for which the Fund uses the data, as described above)
- receipt of the personal information concerning you which you have provided, in a structured, commonly used and machine-readable format and the right to transmit those data to a third party in certain situations
- objecting at any time to processing of personal information concerning you for direct marketing
- objecting to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- objecting in certain other situations to continued processing of your personal information
- otherwise restricting processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to the Fund or Administrator
- provide enough information to identify you
- provide proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- provide the information to which your request relates

Keeping your personal information secure

The Fund has in place appropriate security measures to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. The Fund limits access to your personal information to those who have a genuine business need to know it. Those processing your information, including the Administrator, will do so only in an authorised manner and are subject to a duty of confidentiality.

The Fund also has procedures in place to deal with any suspected data security breach. The Fund will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

The Fund hopes that any query or concern you raise about use of your information can be successfully resolved.

The [General Data Protection Regulation](#) also gives you a right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 23 May 2018 and is effective from 25 May 2018.

The Fund may change this privacy notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. The Fund will publish the changed privacy notice on the Fund's website and any changes will take effect as soon as such notice is posted.

How to contact us

Please contact us if you have any questions about this privacy notice or the information held about you.

If you wish to contact us please send an email to enquiries@riverandmercantile.com, or call 0345 603 3618.